

## DRAFT NEW LONDON PLAN – EXAMINATION IN PUBLIC

### Statement on Matter M15

Respondent Number	1684
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**M15. Would the Plan be effective in ensuring that development contributes positively to regeneration where it is needed and the building of strong and inclusive communities in accordance with Policy GG1? In particular:**

**a) Would Figure 2.19 provide an effective and justified strategic framework for the identification of regeneration areas in local plans and neighbourhood plans?**

**b) Would Policy SD10 provide an effective and justified strategic framework for the preparation of (i) policies in local plans and neighbourhood plans and (ii) regeneration strategies and programmes?**

Paragraph 1.1.4 describes exactly what is required for strong and inclusive communities and the suggested minor change on heritage and identity is welcomed.

However, Policy GG1 is inadequate in meeting those requirements and would reduce the effectiveness of the Plan. It fails to specify as policy the requirements in paragraph 1.2.3 for “places where local amenities are within walking . . . distance.”

GG1B should start with the words ‘provide easy access within walking distance to . . .’

London Forum suggested additional words to that policy also to make it clear what services should be provided near to homes.

To achieve the community “buy-in” in GG1C, it should be made clear that the streets and public spaces created should be planned to a high standard and uncluttered.

London Forum’s other proposals that could improve Policies GG1 to GG6 are included in our statement for Matter 9 and, if made to the NLP would improve management regeneration.

M15 a) – Probably, from the details in Annex 1 but in the draft NLP there seems to be no ‘Figure 2.19’ except the heading for it following paragraph 2.10.6. Table A1.1 relates only to town centres, not other areas of deprivation or blight.

M15 b) – Yes, if local authorities can devote sufficient resources and skills to describing within their Local Plan all of the requirements in the minor suggested change Policy SD10 A 2A) which is welcomed.

**London Forum proposes that paragraph 2.10.4 for identifying Local Areas of Regeneration should be a part D of Policy SD10.**

Neighbourhood Plans should not be necessary in areas of regeneration if the Local Plans contain relevant area policies.

### **London Forum proposes the following changes to Policy SD10.**

There should be reference in Policy SD10 to considering the homes that people have now in Local Areas for Regeneration. Exploitation of people experiencing inequality and deprivation has been reported in those areas, caused by landlords of Houses in Multiple Occupation which are overcrowded, poorly maintained and, in some cases, unfit for habitation. The rents that some people have to pay and the lack of space for a normal family life worsens their deprivation and those who have to seek benefits to survive add to the cost to the 'public purse' and result in landlords being subsidised by the State.

### **The New London Plan should require boroughs to take action to reduce that problem.**

**Policy SD10** must mention in section B the private-rented sector (PRS) housing of people suffering deprivation and overcrowded housing.

Boroughs must take account of (PRS) problems which make people's lives worse.

**Policy SD10 section A 2)** should have added to its end ', including the types of homes, their tenure and suitability that people in those areas occupy.'

**There should be an extra section D in Policy SD10** that 'Boroughs should include proposals for PRS regulation and monitoring in their local policies to achieve homes fit for purpose. The results should be included in their Annual Monitoring Report.'

**Another section E in Policy SD10** should be added to state 'Boroughs should to prioritise some areas for local regeneration for the supply of social housing to alleviate problems that those on low incomes can experience in the PRS.'

**A section F is required in Policy SD10** that 'No enforced displacement of people living locally in Strategic Areas for Regeneration should be caused by changes and developments made.'

### **Policy SD10 should have another section G as follows –**

'Boroughs should plan to improve the quality of the neighbourhoods, streets, and local economies in areas where there are concentrations of deprivation and disadvantage.'

There needs to be a strong policy focus on equipping people with increased skills to improve their opportunities, as in paragraph 2.10.2. Policy E11, as modified by the early minor changes should be satisfactory.